UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:) Chapter 13
Robin Lynn Carpenter,)
Debtor.) Case No. 15-30124-KRH

MOTION TO RESTRICT ACCESS TO EXHIBITS

Comes now Michael Averett (the "Movant"), by counsel, and for his Motion to Restrict Access to Exhibits to the Objection to Confirmation of Debtor's Chapter 13 Plan previously filed herein states the following:

- 1. On or about January 9, 2015, Robin Lynn Carpenter (the "<u>Debtor</u>") filed a Petition under Chapter 13 of Title 11 of the United States Code in this Court.
- 2. In connection with the Debtor's Chapter 13 Plan, the Movant filed an Objection to Confirmation of Debtor's Chapter 13 Plan with exhibits [Docket No. 32] (the "Objection").
- 3. Movant recently discovered that the exhibits to the Objection [Docket No. 32-1] (the "Exhibits") contain certain private information of the Movant which should not be divulged to the general public.
- 4. The private information contained in Docket No. 32-1 was included in error and the Movant desires to restrict access to the Exhibits.

Robert H. Chappell, III, Esquire (VSB No. 31698)

Jennifer J. West, Esquire (VSB No. 47522)

Neil E. McCullagh, Esq. (VSB No. 39027)

James K. Donaldson, Esquire (VSB No. 80307)

Spotts Fain PC

411 East Franklin Street, Suite 600

Richmond, Virginia 23219

Telephone: (804) 697-2000 Facsimile: (804) 697-2100 Counsel for Michael Averett WHEREFORE, Michael Averett prays that this Court enter an Order restricting access to Docket No. 32-1 herein, allowing Movant twenty-one (21) days from the date of entry of such Order to file replacement exhibits and that he may have such other and further relief as may be appropriate under the circumstances.

MICHAEL AVERETT

By: /s/ Neil E. McCullagh
Counsel

Robert H. Chappell, III, Esquire (VSB No. 31698) Jennifer J. West, Esquire (VSB No. 47522) Neil E. McCullagh, Esq. (VSB No. 39027) James K. Donaldson, Esquire (VSB No. 80307) Spotts Fain PC 411 East Franklin Street, Suite 600 Richmond, Virginia 23219

Telephone: (804) 697-2000 Facsimile: (804) 697-2100 Counsel for Michael Averett

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion was sent via U.S. Mail, postage prepaid, and/or delivered by electronic means, this 26th day of August, 2015 to the following, constituting all necessary parties:

Robin Lynn Carpenter
Robert Easterling
12505 Toll House Rd.
2217 Princess Anne St., Ste. 100-2
Spotsylvania, VA 22551-8134
Frederickburg, VA 22401

Carl M. Bates, Trustee
P. O. Box 1819
Chapter 13 Trustee's Office
Richmond, VA 23218
P.O. Box 1819
Richmond, VA 23218

/s/ Neil E. McCullagh Counsel